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VIA ECF

Hon. Christian F. Hummel
U.S. Magistrate Judge
U.S. District Court, Northern District of New York
James T. Foley Courthouse
445 Broadway, Room 441
Albany, NY 12207

Re: AngioDynamics, Inc. v. C.R. Bard, Inc. et al., No. 1:17-cv-0598 (BKS/CFH)

Dear Judge Hummel:

We represent Defendants in the above-captioned matter and write jointly with Plaintiff to request an extension of the deadlines to complete discovery and file dispositive motions. Specifically, we request extensions of the following deadlines set forth in the October 4, 2018 Pretrial Scheduling Order (Dkt. No. 36) and the March 5, 2019 Text Order (Dkt. No. 41):

	Current	New
Opening Expert Report	8/15/2019	10/11/2019
Rebuttal Expert Report	9/27/2019	11/26/2019
Reply Expert Report	11/1/2019	1/10/2020
Discovery Closes	11/15/2019	1/24/2020
Motions Due	12/6/2019	2/7/2020

The parties are mindful of the Court's directive to move this case along quickly, and we have been working hard and have made substantial progress. Nevertheless, lead counsel for Defendants have two trials this summer (one in June and one in July), each of which already has been postponed and cannot be moved. Moreover, given the volume of documents that have been produced, each side requires additional time to review and analyze the other side's production to prepare for depositions and expert reports. The parties have substantially completed their document productions and, in total, have produced over one million pages of electronic documents from the files of 60 custodians in response to nearly 80 requests for production. Accordingly, the parties respectfully request this relatively modest extension. We are, of course, happy to discuss if the Court wishes to do so.

Respectfully submitted,

/s/ Edward Moss

Edward Moss
of O'MELVENY & MYERS LLP

ENM

cc: All Parties via ECF